



State of Utah

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Environmental Quality

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Site ID: 11594

## Title V Operating Permit

**PERMIT NUMBER: 4500006001(DRAFT)**

**DATE OF PERMIT: January 29, 2002**

Date of Last Revision: September 30, 2003

This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Tooele Army Depot  
Environmental Office  
SJMTE - CS - EO  
Tooele, UT 84074-5000

**Permitted Location:**

Tooele Army Depot  
SMATE-CS-EO  
Department of the Army  
Tooele, UT 84074-5000

UTM coordinates: 4,488,200 meters Northing, 385,340 meters Easting  
SIC code: 9711

## ABSTRACT

The Tooele Army Depot is a United States Army installation. This stationary source is an area source with several emission units including boilers, generators, paint booths, three incinerators, and a ground water treatment plant. The rotary kiln incinerator located in building 1320 is subject to 40 CFR 63 Subpart EEE; therefore, the source is subject to Title V. The rotary kiln incinerator is used to destroy ammunition ranging from small arms through 20 mm and includes an afterburner, cyclone, and high temperature ceramic baghouse. This permit contains applicable requirements for the rotary kiln incinerator. Pursuant to R307-415-4(3)(b), applicable requirements for other emission units located at the stationary source have not been included in this permit.

## UTAH AIR QUALITY BOARD

By:

Richard W. Sprott, Executive Secretary

Prepared By:

Robert Grandy

## Operating Permit History

1/29/2002 - Permit issued	Action initiated by an initial operating permit application	
3/12/2002 -Permit modified	Action initiated by an administrative amendment (initiated by source)	Change allowable pressure drop range for rotary kiln incinerator, ceramic baghouse from 1 to 10 inch of water to greater than 1 inch of water.
11/12/2003 - Permit drafted	Action initiated by a significant operating permit modification	to include a compliance plan and compliance date extension for 40 CFR Part 63, Subpart EEE

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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

**Section I: General Provisions**

**I.A. Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

**I.B. Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

**I.C. Duty to Comply.**

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

**I.D. Permit Expiration and Renewal.**

**I.D.1 This permit is issued for a fixed term of five years and expires on January 29, 2007. (R307-415-6a(2))**

**I.D.2** Application for renewal of this permit is due by July 29, 2006. An application may be submitted early for any reason. (R307-415-5a(1)(c))

**I.D.3** An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

**I.D.4** Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

**I.E. Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

**I.F. Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

**I.G. Permit Fee.**

**I.G.1** The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

**I.G.2** The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

**I.H. No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

**I.I. Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

**I.J. Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K. Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L. Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **January 28, 2003** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
EPA, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202-2466

**I.M. Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

**I.N. Emergency Provision.**

I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))

I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))

I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))

I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))

I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

**I.O. Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

**I.P. Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

**I.Q. Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.

**I.R. Permit Modifications.**

Permit modifications are governed by R307-415-7f.



I.S.       **Records and Reporting.**

I.S.1       Records.

I.S.1.a       The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b       For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1       The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2       The date analyses were performed.

I.S.1.b.3       The company or entity that performed the analyses.

I.S.1.b.4       The analytical techniques or methods used.

I.S.1.b.5       The results of such analyses.

I.S.1.b.6       The operating conditions as existing at the time of sampling or measurement.

I.S.1.c       Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2       Reports.

I.S.2.a       Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b       All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c       The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 7 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3       Notification Addresses.

I.S.3.a       All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000

- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and  
Environmental Justice (mail code 8ENF)  
999 18th Street, Suite 300  
Denver, CO 80202-2466

For reports, notifications, or other correspondence  
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance  
Air & Radiation Program (mail code 8P-AR)  
999 18th Street, Suite 300  
Denver, CO 80202-2466  
Phone: 303-312-6440

**I.T. Reopening for Cause.**

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:

- I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))
- I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))
- I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))
- I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))
- I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

**I.U. Inventory Requirements.**

- I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)
- I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

## **Section II: SPECIAL PROVISIONS**

### **II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.**

(R307-415-4(3)(a) and R307-415-4(4))

#### **II.A.1 APE 1236M1 Deactivation Furnace** (designated as APE 1236)

Unit Description: The APE 1236M1 deactivation furnace is a rotary furnace used to destroy ammunition ranging from small arms through 20 mm. The furnace is equipped with a cyclone, diesel oil-fired afterburner, high temperature baghouse, fan, and stack.

### **II.B. Requirements and limitations.**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

#### **II.B.1 Conditions on APE 1236M1 Deactivation Furnace ( APE 1236)**

##### **II.B.1.a Condition:**

The affected emissions unit shall be in full compliance with 40 CFR 63 Subpart EEE no later than September 30, 2004 per extension granted by the Executive Secretary, as specified in 40 CFR 63.1206(a)(1). As a condition for the extension, the permittee shall complete the following actions by the dates indicated:

(1) Sensors and equipment for measuring building pressure shall be installed by December 31, 2003.

(2) Supplemental information shall be sent to EPA Region VIII by April 30, 2004 regarding the petition for alternative pressure monitoring. The supplemental information shall include building pressure measurements.

After the affected emissions unit is in full compliance with 40 CFR Part 63, Subpart EEE, the operating requirements specified in the Notification of Compliance will be incorporated into this permit. [Authority granted under 40 CFR Part 63, Subparts EEE and A; condition originated in 40 CFR Part 63, Subparts EEE and A]

##### **II.B.1.a.1 Monitoring:**

The permittee shall comply with all applicable performance testing and monitoring requirements of 40 CFR 63 Subparts A and EEE.

##### **II.B.1.a.2 Recordkeeping:**

The permittee shall comply with all applicable record keeping requirements of 40 CFR 63 Subparts A and EEE. Records and results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

##### **II.B.1.a.3 Reporting:**

The permittee shall comply with the reporting requirements in Section I of this permit and any additional reporting and notification requirements of 40 CFR 63 Subparts A and EEE, as applicable. The permittee shall also submit monthly certified progress reports regarding the status of actions required for the 40 CFR Part 63, Subpart EEE compliance date extension.

II.B.1.b

**Condition:**

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5; condition originated in DAQE-160-02]

II.B.1.b.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.b.2

**Recordkeeping:**

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c

**Condition:**

Hours of operation shall be no greater than 20 hours per day and 6,000 hours per rolling 12-month period while feeding hazardous waste (HW). [Authority granted under R307-401(6) [BACT]; condition originated in DAQE-160-02]

II.B.1.c.1

**Monitoring:**

By the 15th day of each month, the permittee shall calculate the total hours of HW operations in the previous 12 months for the affected emission unit. The hours of HW operations for the affected emission unit shall be determined by an hour meter and/or a log.

II.B.1.c.2

**Recordkeeping:**

Records of monitoring shall be kept on a daily basis during operations. Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.1.c.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d

**Condition:**

Sulfur content of any oil burned shall be no greater than 0.5 % by weight. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.d.1

**Monitoring:**

For each delivery of oil, the permittee shall either:

(1) Determine the fuel sulfur content expressed as wt% in accordance with the methods of the American Society for Testing Materials (ASTM);

(2) Inspect the fuel sulfur content expressed as wt% determined by the vendor using methods of the ASTM; or

(3) Inspect documentation provided by the vendor that indirectly demonstrates compliance with this provision.

II.B.1.d.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.d.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e

**Condition:**

The permittee shall use only #2 fuel oil as a primary fuel and propane as a pilot fuel. [Authority granted under R307-401-6(1)[BACT]; condition originated in DAQE-160-02]

II.B.1.e.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.e.2

**Recordkeeping:**

The permittee shall keep one or more of the following sets of records for the affected emission unit:

- (1) Documentation that the burners can only use the fuels listed in this condition;
- (2) Documentation that fuels other than those listed in this condition cannot be supplied to the burners without modification of the fuel supply system; or
- (3) Fuel bills or fuel meter readings that demonstrate only the fuels listed in this condition are combusted in the burners.

If fuel bills or fuel meter readings will be used, the permittee shall review fuel bills or fuel meter readings at least once per quarter to determine compliance with this condition. The records required by this condition shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.e.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.f

**Condition:**

Afterburner temperature shall be no less than 1200 degrees F and no greater than 1800 degrees F during the HW incineration period. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.f.1

**Monitoring:**

(a) Location. The temperature of the chamber subject to this provision shall be measured at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The temperature measurement data recorder shall be located such that an inspector/operator can safely read the output.

(b) Frequency. The temperature shall be measured at least once every 30 seconds during each hazardous waste (HW) incineration period. The HW incineration period is the period extending from the time when HW feed to the affected emission unit starts until the HW residence time has transpired. The HW residence time means the time elapsed from cutoff of the flow of HW into the affected emission unit (including, for example, the time required for liquids to flow from the cutoff valve into the affected emission unit) until solid, liquid, and gaseous materials from the HW, excluding residues that may adhere to combustion chamber surfaces, exit all combustion chambers at the affected emission unit. If the affected emission unit has multiple firing systems whereby the HW residence time may vary for the firing systems, the HW residence time for purposes of complying with this subpart means the longest HW residence time for any firing system in use at the affected emission unit at the time of HW cutoff.

(c) Calibration. The temperature readings shall be accurate to plus or minus 50 degrees F. The temperature measurement device shall be calibrated against a primary standard at least once every 12 months. The primary standard shall be established by the permittee and shall be submitted to the Executive Secretary for approval.

II.B.1.f.2

**Recordkeeping:**

For each HW incineration period at each affected emission unit, the permittee shall record the following information: the time and date HW feed started; time and date HW feed stopped; time and date the HW residence time transpired; and the name of each firing system used. The permittee shall also record the calculated HW residence time for each firing system at each affected emission unit and documentation supporting these calculations. These records and all other records required by section I.S.1 of this permit shall be maintained in accordance with section I.S.1.

II.B.1.f.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.g

**Condition:**

Gas residence time shall be no less than 2 seconds in the afterburner during the HW incineration period. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.g.1

**Monitoring:**

In lieu of monitoring gas residence time, the permittee shall monitor stack gas velocity as follows:

(a) Frequency. The stack gas velocity shall be measured at least once every 30 seconds during each HW incineration period, as defined in this permit. The stack gas velocity data recorder shall be located such that an inspector/operator can safely read the output.

(b) Calibration. The velocity readings shall be accurate to plus or minus 5 feet per second. The velocity measurement device shall be calibrated against a primary standard at least once every 12 months. The primary standard shall be established by the permittee and shall be submitted to the Executive Secretary for approval.

The permittee shall be considered to be in compliance with gas residence time requirement of this condition when the stack gas velocity is less than or equal to 70 feet per second.

II.B.1.g.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.g.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.h

**Condition:**

Baghouse pressure drop shall be no less than 1 inches of water column during the HW incineration period. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.h.1

**Monitoring:**

The permittee shall monitor the pressure drop across the baghouse as follows:

(a) Frequency. The pressure drop shall be measured at least once every 30 seconds during each HW incineration period, as defined in this permit. The pressure drop data recorder shall be located such that an inspector/operator can safely read the output.

(b) Calibration. The pressure drop readings shall be accurate to plus or minus 0.5 inches of water column. The pressure drop measurement device shall be calibrated against a primary standard at least once every 12 months. The primary standard shall be established by the permittee and shall be submitted to the Executive Secretary for approval.

II.B.1.h.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.h.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.i

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from any fugitive emission point associated with the affected emission unit. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.i.1

**Monitoring:**

In lieu of monitoring via visible emission observations, the pressure inside each affected emission unit shall be monitored to demonstrate that it is less than atmospheric pressure.

(a) Location. The pressure difference between the primary chamber and atmosphere shall be measured. The pressure measurement data recorder shall be located such that an inspector/operator can safely read the output.

(b) Frequency. The pressure difference shall be measured at least once every 30 seconds during each hazardous waste (HW) incineration period, as defined in this permit.

II.B.1.i.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.i.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.j

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the affected emission unit's stack. [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.j.1

**Monitoring:**

An opacity determination shall be conducted once in each quarter that the affected emission unit is operated. The opacity determination shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.

II.B.1.j.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.j.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.k

**Condition:**

Emissions of PM<sub>10</sub> shall be no greater than 0.456 lbs/hr and 0.016 grains/dscf (68 degrees F, and 29.92 in Hg). [Authority granted under R307-401-6(1) (BACT); condition originated in DAQE-160-02]

II.B.1.k.1

**Monitoring:**

Stack testing shall be performed as specified below:

(a) Frequency. Emissions shall be tested every five years.

(b) Notification. The Executive Secretary shall be notified at least 30 days prior to conducting any required emission testing. A source test protocol shall be



submitted to DAQ when the testing notification is submitted to the Executive Secretary. The source test protocol shall be approved by the Executive Secretary prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Executive Secretary.

(c) Methods.

(1) Sample Location - the emission point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1.

(2) For stacks in which no liquid drops are present, the following methods shall be used: 40 CFR 51, Appendix M, Methods 201 or 201A. 40 CFR 51, Appendix M, Method 202 shall be used to determine condensibles.

(3) For stacks in which liquid drops are present, methods to eliminate the liquid drops should be explored. If no reasonable method to eliminate the drops exists, then the following methods shall be used: 40 CFR 60, Appendix A, Method 5 or 51 as appropriate. The portion of the front half catch considered  $PM_{10}$  shall be based on information in Appendix B of the fifth addition of the EPA document, AP-42, or other data acceptable to the Executive Secretary. Condensibles shall be determined using the back half catch.

(4) The condensibles shall not be used for compliance demonstration but shall be used for inventory purposes.

(d) Calculations. To determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the emission limitation.

(e) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

II.B.1.k.2

**Recordkeeping:**

Results of all stack testing shall be recorded and maintained in accordance with the associated test method and Provision S.1 in Section I of this permit.

II.B.1.k.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C. **Emissions Trading.**

(R307-415-6a(10))

Not applicable to this source.

II.D. **Alternative Operating Scenarios.**

(R307-415-6a(9))

Not applicable to this source.

**Section III: PERMIT SHIELD**

A permit shield was not granted for any specific requirements.

**Section IV: ACID RAIN PROVISIONS.**

**This source is not subject to Title IV. This section is not applicable.**

## REVIEWER COMMENTS

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This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-160-02                      dated    March 05, 2002

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**1. Comment on an item originating in DAQE-160-02 regarding APE 1236M1 Deactivation Furnace (Unit APE 1236)**

Portions of Condition 11 regarding initial testing are Obsolete: Portions of Condition 11 regarding initial testing are obsolete and have not been included in this permit. Initial testing was conducted between April 20 and May 4 of 2000. This testing demonstrated compliance with the PM<sub>10</sub> emission limit in condition 10. [Comment last updated on 3/12/2002]

**2. Comment on an item originating in R307-203 regarding APE 1236M1 Deactivation Furnace (Unit APE 1236)**

Fuel sulfur content requirement of 0.85 lb/MMBtu subsumed by 0.5 wt% BACT requirement.: R307-203-1 requires that any oil shall contain no more than 0.85 lb sulfur per million gross BTU. The 0.5 sulfur wt% requirement in condition 15 of DAQE-160-02 is the best available control technology requirement and is more stringent than the fuel sulfur content requirement of R307-203-1. Therefore, only 0.5% will be included in the consolidated AO since it is more stringent than R307-203-1. In addition, since 0.5 is expressed as percent by weight, records of gross heating value and density as specified in R307-203-1(a) are not necessary and will not be recorded. Alternative monitoring is allowed by R307-203. [Comment last updated on 3/12/2002]

**3. Comment on an item originating in R307-201 regarding APE 1236M1 Deactivation Furnace (Unit APE 1236)**

R307-201-1(2) does not apply to incinerators: R307-201-1(2) specifically exempts incinerators from visible emission limitations assigned pursuant to R307-201. The affected emission unit is subject to a visible emission limitation of 10% under DAQE-160-02. [Comment last updated on 3/12/2002]

**4. Comment on an item originating in DAQE-160-02 regarding APE 1236M1 Deactivation Furnace (Unit APE 1236)**

Primary Standards for Calibration: Condition 9 of the subject approval order requires the permittee to calibrate the monitoring devices for stack gas velocity, exhaust gas temperature, and pressure drop against a primary standard at least once per year. The permittee is required to submit the primary standards to the Executive Secretary for approval. The permittee described the proposed primary standards in a letter dated December 26, 2001, to the Executive Secretary. In this letter, the permittee stated the monitoring devices would be calibrated with measuring and test equipment with certified NIST traceability. Therefore, the permittee will calibrate the monitoring devices at least once per year with measuring and test equipment with certified NIST traceability. [Comment last updated on 3/12/2002]

